

**EXHIBIT B**

**PARSONS DECLARATION**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

LORDSTOWN MOTORS CORP., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831-MFW

(Jointly Administered)

**DECLARATION OF KIM PARSONS, AS DESIGNEE OF BARRY L. LEONARD & CO.  
INC. IN ITS CAPACITY AS CHAIR OF THE COMMITTEE, IN SUPPORT OF  
APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT  
AND RETENTION OF TROUTMAN PEPPER HAMILTON SANDERS LLP AS  
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
EFFECTIVE AS OF JULY 17, 2023**

I, Kim Parsons, hereby declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury as follows:

1. This declaration (the “Declaration”) is being submitted in support of the *Application for Entry of an Order Authorizing the Employment and Retention of Troutman Pepper Hamilton Sanders LLP as Counsel to the Official Committee of Unsecured Creditors Effective as of July 17, 2023* (the “Application”).<sup>2</sup>

2. Unless otherwise stated, I have personal knowledge of the facts set forth hereinafter. All capitalized terms not defined herein shall have the meanings ascribed to them in the Application.

3. On June 27, 2023 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Application.

4. The Debtors continue to operate their business and manage their properties as debtors and debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. On July 11, 2023, the United States Trustee appointed the Committee pursuant to section 1102(a) of the Bankruptcy Code. *See* D.I. 99. The Committee consists of three members: (i) Barry L. Leonard & Co. Inc.; (ii) SA Automotive Ltd. and (iii) Superior Cam Inc.

6. On the Retention Date, the Committee selected Troutman Pepper to serve as its counsel pursuant to section 1103(a) of the Bankruptcy Code.

7. Barry L. Leonard & Co. Inc. has been selected as Chair of the Committee. I am the primary authorized designee of Barry L. Leonard & Co. Inc. participating on the Committee.

8. The Committee interviewed multiple law firms interested in serving as counsel to the Committee in these chapter 11 cases.

9. Ultimately, on July 17, 2023, the Committee selected Troutman Pepper to serve as its counsel.

10. Troutman Pepper was selected to serve as counsel to the Committee based upon, among other things, its experience representing official committees in chapter 11 cases before this Court, its expertise in bankruptcy, litigation, and commercial law, and the subject matter of these cases, and its hourly rates.

11. Throughout these cases, the Committee will supervise Troutman Pepper's fees and expenses to manage costs. The Committee understands that Troutman Pepper's fees and expenses will be the sole responsibility of the Debtors' estate and that neither the Committee nor

its members or designees shall have any obligation to pay Troutman Pepper's fees or expenses. The Committee understands and has agreed that Troutman Pepper will be paid for its services a blended rate of \$750/hour for all timekeepers, *provided that* if general unsecured creditors recover at least 50% in these chapter 11 cases, Troutman Pepper may apply to recover the difference (if any) between its standard hourly rates and the blended rate, subject to Court approval.

12. The Committee further understands that Troutman Pepper's current standard hourly rates currently range from \$740 to \$1,680 for partners and counsel, \$530 to \$850 for associates, and \$250 to \$440 for paraprofessionals, and that Troutman Pepper increases its hourly billing rates for its professionals and paraprofessionals periodically, typically as of January 1 of each year. The Committee has consented to such ordinary course rate increases.

13. Based on the foregoing, the Committee is of the opinion that it is appropriate to employ Troutman Pepper and that such employment is in the best interest of the Committee and the Debtors' estates.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

Dated: August \_\_, 2023

Barry L. Leonard & Co. Inc.

By: /s/ Kim Parsons  
Name: Kim Parsons  
Title: Primary Designee of Chair